## Chapter 6

# EPA Identification Numbers, Manifesting, Transporters, TSD Facilities, and Land Disposal Restrictions

## **EPA IDENTIFICATION NUMBERS** <sup>1</sup>

Hazardous waste generators must have an Identification (ID) Number before a registered hazardous waste transporter will accept their hazardous waste for shipment. The ID Number, which is issued either by the U. S. Environmental Protection Agency (U.S. EPA ID Number), or by the Department of Toxic Substances Control, DTSC (California ID Number), identifies each generator of hazardous waste. It is required to be on you hazardous waste manifests. The ID Number enables generators, transporters, and regulators to track the hazardous waste from its origin to final disposal, "cradle to grave". A generator should only have one active EPA ID number from either the State or U.S. EPA.

If your business generates more than 100 kilograms (220 pounds) of RCRA waste per month or more than 1 kilogram (2.2 pounds or 1 quart) of RCRA acutely hazardous waste per month, then a U.S. EPA ID number must be obtained. Contact USEPA Region 9 at (415) 495-8895 for the necessary forms. You will be required to complete the forms and return them to obtain an EPA ID number.

If you only generate non-RCRA hazardous wastes, or you generate less than 100 kilograms of RCRA hazardous waste per month (or less than 1 kilogram of RCRA acutely hazardous waste), you must obtain a California ID Number. A California ID Number can be obtain by completing and submitting the "California Hazardous Waste Permanent ID Number Application", DTSC Form 1358, by mail, e-mail, or fax. You can download the form from the DTSC website at <a href="http://www.dtsc.ca.gov/">http://www.dtsc.ca.gov/</a> or you can request a blank form by calling DTSC at 800-618-6942.

## MANIFESTING<sup>2</sup>

Generators of hazardous waste must ship their hazardous waste to a licensed hazardous waste treatment, storage or disposal facility (TSDF) under a Uniform Hazardous Waste Manifest. Generators must use a California manifest unless the hazardous waste is destined for a state that has its own manifest. The manifest is the legal document used for tracking hazardous waste from "cradle to grave".

Although your hazardous waste hauler may assist you in completing your manifest, it is your responsibility to track your hazardous waste to the proper destination. The manifest consists of six copies and is color-coded to assist you in tracking your wastes and provides a means for record management:

- **Copy 1 Original** Hauler takes this copy (white) to the TSDF. TSDF mails this page to DTSC.
- Copy 2 You must mail this copy (blue) to DTSC within 30 days of waste disposal.
- Copy 3 Hauler takes this copy (yellow) to the TSDF. The TSDF sends it back to you within 30 days of waste disposal. You must keep this copy for three years.
- **Copy 4** Hauler gives you (the generator) this copy (yellow) when the waste is picked up.
- **Copy 5** Hauler keeps this copy (green) for their records.
- Copy 6 Hauler takes this copy (goldenrod) to the TSDF. The TSDF keeps this copy.

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## TRANSPORTERS AND TSDFs <sup>3</sup>

As a hazardous waste generator you are required to use a registered hazardous waste transporter (DTSC registered) and properly permitted Treatment, Storage, and Disposal Facility (TSDF).

**IT IS YOUR RESPONSIBILITY** as the generator of the hazardous waste to obtain the names of approved transporters and TSD facilities. You can obtain a list of registered transporters and properly permitted TSDFs from either the Regional DTSC Duty Officer at 800-728-6942 or the HMD Duty Specialist at (619) 338-2231.

#### LAND DISPOSAL RESTRICTIONS 4

There are special sets of regulations that prohibit hazardous waste from being disposed to the land. These special regulations are called Land Disposal Restrictions (LDRs). These restrictions require treatment of hazardous wastes to reduce their hazard prior to land disposal. In order for certain hazardous wastes to be disposed to the land they must meet the following conditions:

- ✓ The waste already meets specific treatment standards,
- ✓ The waste is otherwise considered treated, or
- ✓ The waste is exempted from the LDR regulations.

Under the LDRs, most hazardous wastes require certification that a specific treatment standard has been met. The treatment standards were established using a specific analytical method. You must use the same method for testing your waste streams. As a generator, you are required to do the following whenever you are shipping hazardous waste for treatment or land disposal:

- ✓ Classify your waste,
- ✓ Identify the treatment standard and the date that standard became effective,
- ✓ Provide notification statements,
- ✓ Provide certification that the waste meets the treatment standard, and
- ✓ Retain all waste analysis, notifications, and other **LDR** documentation for at least 3 years.

#### **REFERENCES:**

- 1. Title 22 California Code of Regulations (CCR) Section 66262.12
- 2. Title 22 CCR Section 66262.20 to Section 66262.23
- 3. California Health & Safety Code Sections 25160 and 25163
- 4. Title 22 CCR Section 66268.1 et.al.

Department of Toxic Substances Control publication: LDR Handbook---A Guide to Land Disposal Restrictions.